27177 185TH AVE SE, COVINGTON 98042

DECLARATION OF DEPUTY PROSECUTING ATTORNEY

I, Janine Joly, am a senior deputy prosecuting attorney with the King County Prosecuting Attorney's Office. I am assigned to handle the voter registration challenges related to the above-listed mailbox facility on behalf of the Prosecuting Attorney.

Attorneys and staff of the King County Prosecuting Attorney's Office ("Prosecuting Attorney Staff") have exercised due diligence to verify that the challenged voters do not reside at the address listed in their voter registration records, **27177 185th Ave SE, Covington**. The following steps were taken to contact the challenged voters and to learn their actual residential addresses.

1. Prosecuting Attorney Staff sent a letter by first class mail to the address provided in each voter's registration record. The letter explained the legal requirements for voter registration and asked the voter to correct his/her registration. The letters were sent between May 16 and May 21, 2013. A sample of the letter is enclosed.

2. I visited the address provided in the voters' registration record. The address belongs to a mailbox facility. I saw no indication that there were apartments or other types of residences at the address. A copy of a photograph of the facility is enclosed.

3. I contacted the manager/owner of the business located at address provided in the voters' registration record by mail. The manager/owner signed the enclosed declaration stating that to the best of his/her knowledge, no person resides at the address.

4. Prosecuting Attorney Staff searched an online telephone directory to determine if the voters have address listings in the county.

5. Prosecuting Attorney Staff searched county property records, specifically the King County Assessor's property assessment database, to determine whether the challenged voters own property in the county. This information was compared to the information in paragraph 4 above in an attempt to learn the voters' actual residential addresses. If we found what appeared to be a voter's actual residential address, we have provided it with the challenge.

6. Prosecuting Attorney Staff searched the statewide voter registration database to determine if the voters are registered to vote at any other address in the state. The challenged voters are not.

I declare under penalty of perjury of the laws of the State of Washington that having exercised due diligence to verify the evidence presented, that to the best of my knowledge and belief, the challenged voters on the attached list do not reside at the address provided in their voter registration records.

Dated this 6th day of June, 2013, at Seattle, Washington.

Janine Joly

Janine Joly, Senior Deputy Prosecuting Attorney
King County Prosecuting Attorney's Office

Voter Registration Challenge Form

Challenger:

Daniel T. Satterberg, King County Prosecuting Attorney
By Janine Joly, Senior Deputy Prosecuting Attorney
Civil Division
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
(206) 296-0430
janine.joly@kingcounty.gov

Address as it appears in the voter's registration record:

27177 185th Ave SE, Covington 98042

Basis of Challenge:

The challenged voter does not reside at the address listed on his or her voter registration.

Oath:

I, Janine Joly, declare under penalty of perjury under the laws of the State of Washington that I:

- Am a registered voter in the State of Washington;
- Have personal knowledge and belief that the person named above is not qualified to vote for the reason or reasons indicated in the affidavit;
- Have exercised due diligence to personally verify the evidence that accompanies this affidavit; and
- Believe that the challenged voter does not reside at the address listed on his or her voter registration.

Dated this 6th day of June, 2013, at Seattle, Washington.

Janine Joly
Senior Deputy Prosecuting Attorney
King County Prosecuting Attorney's Office

DECLARATION OF OWNER/MANAGER

I, NILAV ADHIKARI am the owner/~~manager~~ of The UPS Store #6080 _____, a mailbox facility located in King County. The address of the mailbox facility is 27177 185TH AVE SE COVINGTON, WA 98042. To the best of my knowledge no individual resides at this address.

I am over the age of 18 and declare under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 23rd day of May, 2013, at Covington, Washington.
City Where Declaration Was Signed

Signature of Owner/Manager

Google

Address **18291 Washington 516**

Address is approximate

DANIEL T. SATTERBERG
PROSECUTING ATTORNEY

King County

Office of the Prosecuting Attorney
CIVIL DIVISION
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
(206) 296-8820
FAX (206) 296-0415

May 16, 2013

Re: Your King County Voter Registration

Dear Voter:

King County Elections recently reviewed your voter registration record and noted that you appear to be registered to vote at an address that is not a valid residence as required by state law. The Elections Director sent a letter in the last week of March requesting that you confirm your residential address. Having received no response, she referred the matter to this office.

State law requires that your residential address for voter registration purposes be the permanent address where you physically reside. There are some exceptions listed in RCW 29A.04.151 (copy enclosed), but it is not permissible to use the address of a mailbox facility, post office, storage facility, or other business as your residential address if you do not reside there, even if you receive your mail at that address.

You provided the address listed above as your residential address for voter registration purposes. This appears to be the address of a mailbox facility, postal facility or other business where a person would not physically reside. While you may still use this address as your mailing address, you must provide King County Elections with your actual residential address. Please do so by contacting King County Elections by telephone at 206-296-VOTE(8683) or by completing and returning the enclosed voter registration form by May 29, 2013. An addressed postage paid envelope is enclosed.

If you do not contact King County Elections by May 29, further action may be taken regarding your voter registration. This may include the filing of a voter registration challenge which could result in cancellation of your voter registration.

Thank you for your cooperation with this matter.

Sincerely,

Janine Joly

Janine Joly
Senior Deputy Prosecuting Attorney

Encl: RCW 29A.04.151
Voter Registration Form
Pre-paid return envelope

RCW 29A.04.151
Residence.

"Residence" for the purpose of registering and voting means a person's permanent address where he or she physically resides and maintains his or her abode. However, no person gains residence by reason of his or her presence or loses his or her residence by reason of his or her absence:

(1) While employed in the civil or military service of the state or of the United States;

(2) While engaged in the navigation of the waters of this state or the United States or the high seas;

(3) While a student at any institution of learning;

(4) While confined in any public prison.

Absence from the state on business shall not affect the question of residence of any person unless the right to vote has been claimed or exercised elsewhere.

[2003 c 111 § 126; 1971 ex.s. c 178 § 1; 1965 c 9 § 29.01.140. Prior: 1955 c 181 § 1; prior: (i) Code 1881 § 3051; 1865 p 25 § 2; RRS § 5110. (ii) Code 1881 § 3053; 1866 p 8 § 11; 1865 p 25 § 4; RRS § 5111. Formerly RCW 29.01.140.]

RCW 29A.08.112
Voters without traditional residential addresses.

No person registering to vote, who meets all the qualifications of a registered voter in the state of Washington, shall be disqualified because he or she lacks a traditional residential address. A voter who lacks a traditional residential address will be registered and assigned to a precinct based on the location provided.

For the purposes of this section, a voter who resides in a shelter, park, motor home, marina, or other identifiable location that the voter deems to be his or her residence lacks a traditional address. A voter who registers under this section must provide a valid mailing address, and must still meet the requirement in Article VI, section 1 of the state Constitution that he or she live in the area for at least thirty days before the election.

A person who has a traditional residential address must use that address for voter registration purposes and is not eligible to register under this section.

[2006 c 320 § 3; 2005 c 246 § 6.]